

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

ASSOCIATION OF NEW JERSEY
RIFLE & PISTOL CLUBS, INC., et
al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

MARK CHEESEMAN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

BLAKE ELLMAN, et al.

Plaintiffs,

V.

MATTHEW PLATKIN, et al.

Defendants.

Civil Action No. 3:18-cv-10507-PGS-LHG

Civil Action No. 3:22-cv-4360-PGS-LHG

Civil Action No. 1:22-cv-4397-PGS-LHG

NOTICE OF MOTION FOR SUMMARY JUDGMENT

TO: Daniel M. Vannella Esq.
Assistant Attorney General
25 Market St., P.O. Box 112
Trenton, NJ 08625

Bradley Lehman
Gellert Scali Busenkell & Brown, LLC
1201 N. Orange Street, Suite 300
Wilmington, DE 19801

Raymond M. DiGuiseppe
The DiGuiseppe Law Firm, P.C.
4320 Southport-Supply Road, Suite 300
Southport, North Carolina 28461

PLEASE TAKE NOTICE, that on a date to be determined by this Court, Plaintiffs Association of New Jersey Rifle & Pistol Clubs, Inc., Blake Ellman, Marc Weinberg, and Thomas Rogers (collectively “Plaintiffs”) shall move pursuant to Fed. R. Civ. P. 56 before the Honorable Peter G. Sheridan, U.S.D.J., at the United States Courthouse, Clarkson S. Fisher Federal Building and U.S. Courthouse, 402 E. State Street, Trenton, New Jersey 08608 for an Order granting Summary Judgment.

PLEASE TAKE FURTHER NOTICE that in support of the within motion, Plaintiffs shall rely upon the following documents:

- 1) Declaration of Scott Bach
- 2) Declaration of Blake Ellman
- 3) Declaration of Marc Weinberg
- 4) Declaration of Thomas Rogers
- 5) Declaration of Emanuel Kapelsohn

- 6) Declaration of Ashley Hlebinsky
- 7) Statement of Undisputed Material Facts
- 8) Brief.

PLEASE TAKE FURTHER NOTICE that Plaintiffs request oral argument.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

Dated: October 6, 2022

Respectfully submitted,

s/ Daniel L. Schmutter
Daniel L. Schmutter
HARTMAN & WINNICKI, P.C.
74 Passaic Street
Ridgewood, New Jersey 07450
(201) 967-8040
(201) 967-0590 (fax)
dschmutter@hartmanwinnicki.com
Attorney for ANJRPC and Ellman Plaintiffs